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STATE OF CALIFORNIA
BUSINESS, CONSUMER SERVICES AND HOUSING
DEPARTMENT OF FINANCIAL PROTECTION AND INNOVATION

TO: Easy Choice Business Solutions, Inc.
Easy Choice Wireless
John Robertson

5621 Palmer Way, Suite G
Carlsbad, California 92010

<https://easychoicewireless.com>

DESIST AND REFRAIN ORDER

(For violations of section 25401 of the Corporations Code)

The Commissioner of Financial Protection and Innovation (Commissioner) finds that:

1. At all relevant times, Easy Choice Business Solutions, Inc. doing business as Easy Choice Wireless (Easy Choice Wireless) is a California corporation with its principal place of business at 5621 Palmer Way, Suite G, Carlsbad, California 92010. Easy Choice Wireless operated and maintained an internet website located at <https://easychoicewireless.com>.

2. Easy Choice Wireless purported to offer wireless internet services in underserved rural areas and for the recreational vehicle (RV) market through its use of proprietary software and in partnership with the three largest cellular providers. According to its “Growth Equity Investment Opportunity Sheet,” the company sought “to raise \$1 million by offering a minimum of 100,000 and a maximum of 4,000,000 common stock shares for \$0.25 per share.”

3. At all relevant times, Errol Alexander Smart also known as Tony Smart (Smart) is the chief executive officer and founder of Easy Choice Wireless. In its “2022 Executive Summary,” Easy Choice Wireless states that Smart has more than 12 years of experience in the US wireless industry and is keenly tuned into the wireless markets. Smart is “credited to have an established network and technical knowledge that allow the Company to quickly capture market share.”

1 4. At all relevant times, John Robertson (Robertson) was the Vice President of Easy
2 Choice Wireless. Robertson is listed as the contact person for investment inquiries in a document
3 offered to potential investors described as Easy Choice’s “Business Solutions Equity Investment
4 Opportunity” pamphlet.

5 5. The Commissioner has jurisdiction over the offer and sale of securities in California
6 under the Corporate Securities Law of 1968 (Corp. Code, § 25000 et seq.).

7 6. It is “unlawful for any person to offer or sell a security in this state, or to buy or offer
8 to buy a security in this state, by means of any written or oral communication that includes an untrue
9 statement of material fact or omits to state a material fact necessary to make the statements made, in
10 the light of the circumstances under which the statements were made, not misleading.” (Corp. Code,
11 § 25401.)

12 7. Any person who with knowledge directly or indirectly controls and induces another
13 person to violate any provision of the Corporate Securities Law of 1968 or provides substantial
14 assistance to another person in violation of any provision of the Corporate Securities Law of 1968 is
15 deemed to be in violation of that provision to the same extent as the other person (Corp. Code,
16 § 25403, subds. (a), (b).)

17 8. At all relevant times, Robertson controlled and induced or provided substantial
18 assistance to Easy Choice Wireless to commit the violations of law described above within the
19 meaning of Corporations Code section 25403, subdivisions (a) and (b).

20 9. On or around December 29, 2022, Easy Choice Wireless and Robertson offered to
21 sell securities to at least one California resident in the form of common stock in the company. Easy
22 Choice Wireless and Robertson informed the prospective investor that \$5000 was the minimum
23 investment. To become an investor, the prospective investor needed to complete a subscription
24 agreement and send his investment funds to the company. In return, Easy Choice Wireless would
25 send the investor his stock certificates and could expect to receive profits within 15-18 months after
26 his initial investment. During the telephone call with the prospective investor, Robertson told the
27 prospective investor that Easy Choice Wireless was licensed in California.

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1 10. On or around December 29, 2020, Easy Choice Wireless and Robertson emailed the
2 prospective investor documents to review including “2022 Executive Summary,” “Easy Choice
3 Business Solutions Equity Investment Opportunity,” and “Offering Summary and Equity Financing
4 Term Sheet.”

5 11. In connection with the offers and sales of the securities, Easy Choice Wireless and
6 Robertson failed to disclose in written and oral communications that Smart, the company’s chief
7 executive officer and founder, was convicted in 1995 of federal felony charges of wire fraud and
8 mail fraud and that he voluntarily filed for chapter 7 bankruptcy in 2001 and received a discharge of
9 his debts.

10 12. In connection with the offers and sale of the securities, Easy Choice Wireless and
11 Robertson made, or caused to be made, misrepresentations of material facts or omitted to state
12 material facts necessary in order to make the statements made, in the light of the circumstances
13 under which they were made, not misleading. Easy Choice and Robertson omitted to inform the
14 potential investor that the Department issued a 2020 Desist and Refrain Order against Smart for
15 violations of section 25401 of the Corporations Code. This information was material and necessary
16 to make other statements made, in the light of the circumstances under which they were made, not
17 misleading.

18 13. Under Corporations Code section 25532, subdivision (c), if, in the opinion of the
19 Commissioner, a person has violated or is violating section 25401, the Commissioner “may order
20 that person to desist and refrain from the violation.”

21 14. Pursuant to Corporations Code section 25403, any person who controls or induces
22 another person to violate a provision of the Corporate Securities Law of 1968, or any person who
23 provides substantial assistance to another person in violation of the Corporate Securities Law of
24 1968, shall be liable for the violations.

25 Based on the foregoing, the Commissioner is of the opinion that Easy Choice Business
26 Solutions, Inc., doing business as Easy Choice Wireless, and John Robertson have offered or sold a
27 security in California by means of any written or oral communication that includes an untrue
28 statement of material fact or omits to state a material fact necessary to make the statement made, in

1 light of the circumstances under which they were made, not misleading in violation of Corporations
2 Code section 25401.

3 Accordingly, under Corporations Code section 25532, subdivision (c), Easy Choice Business
4 Solutions, Inc. doing business as Easy Choice Wireless and John Robertson are hereby ordered to
5 desist and refrain from offering and selling any security in California by means of any written or oral
6 communication that includes an untrue statement of material fact or omits to state a material fact
7 necessary to make the statements made, in the light of the circumstances under which they are made,
8 not misleading.

9 This Order is necessary, in the public interest, for the protection of consumers, and consistent
10 with the purposes, policies, and provisions of the Corporate Securities Law of 1968. This Order shall
11 remain in full force and effective until further order of the Commissioner.

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13 Dated: May 1, 2023

CLOTHILDE V. HEWLETT
Commissioner of Financial Protection and Innovation



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17 By: _____
18 MARY ANN SMITH
19 Deputy Commissioner
20 Enforcement Division
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